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REMARKS

This paper is responsive to the Office Action dated June 3, 2004. All rejections and objections of the Examiner are respectfully traversed. Reconsideration and further examination is respectfully requested.

In paragraph 2 of the Office Action, the Examiner rejected claims 1-11 as being obvious under 35 U.S.C. 103 by United States patent number 6,643,706 of Marques et al., also citing the Background of the Invention as originally filed. Applicants respectfully traverse this rejection.

Marques et al. disclose a method of distributing route information, in which a number of entries are maintained in a route table indicating that at least one of the entries has been processed by a first process. Each of the entries in Marques et al. corresponds to at least one route between network elements. Fig. 3 of Marques et al. shows a list of route entries that are currently active, and Fig. 8 shows a radix tree structure that can be used to implement a routing table. The cited paragraphs of the Background of the Invention describe a prior art network device in a multicast communication network.

Nowhere in Marques et al. or the Background of the Invention, taken independently or in combination, is there disclosed or suggested any method or system for synchronizing a route change in a routing table with a plurality of multicast routing protocols in a network device, including:

> assigning a route ID value to each route in the routing table;
> assigning a bookmark in a route change queue to each multicast routing protocol, the bookmark having a value equivalent to the route ID value of the last route processed by the multicast routing protocol, *wherein the route change queue is separate from the routing table;*

assigning a new route ID value to each route changed in the routing table;
storing each route changed in the route change queue; and
comparing the bookmark value of each multicast routing protocol to the highest route ID value in the route change queue. (emphasis added)

As in the present independent claim 1. Independent claim 7 includes analogous features.

In contrast, Marques et al. state as follows at line 56 of column 12:

Radix tree 800 can be used to implement *routing table 240*, as noted, and can also act as the foundation for implementing a linked list such as that shown in FIG. 3. (emphasis added)

Additionally, Marques et al. state at line 21 of column 6 as follows:

FIG. 3 illustrates a linked list of route entries (exemplified by linked list 300) that maintains a list of routes that are *currently active*. (emphasis added)

The above sections show how Marques et al. describes techniques for *storing active routes in a route table or linked list*. Marques et al. includes no hint or suggestion of any system or method for storing *changed routes* in a route change queue that is *separate from the routing table*, as in the present independent claims 1 and 7. The Background of the Invention describes only prior art systems in which separate routing tables are maintained for corresponding multicast routing tables, as well as a unicast routing table. In view of this, Marques et al. provide no teaching of any actions performed on such a changed route queue as in the present independent claims 1 and 7, such as the *storing of each route changed in the changed route queue*, or the *assigning* or *comparing of bookmarks* relative to the changed route queue, which are also features of the present independent claims 1 and 7.

For the above reasons, Applicants respectfully urge that the combination of Marques et al. and the Background of the Invention does not disclose or suggest all the features of the present

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independent claims 1 or 7. Accordingly, the combination of Marques et al. and the Background

of the Invention do not support a *prima facie* case of obviousness under 35 U.S.C. 103 with

regard to independent claims 1 and 7. As to the remaining dependent claims, they each depend

from independent claims 1 and 7, and are respectfully believed to be patentable over the

combination of Marques et al. and the Background of the Invention for at least the same reasons.

Reconsideration of all pending claims is respectfully requested.

For these reasons, and in view of the above amendments, Applicants respectfully request

that the rejections of the Examiner be withdrawn. This application is now considered to be in

condition for allowance and such action is earnestly solicited.

Applicants have made a diligent effort to place the claims in condition for allowance.

However, should there remain unresolved issues that require adverse action, it is respectfully

requested that the Examiner telephone David A. Dagg, Applicants' Attorney at 978-264-6664 so

that such issues may be resolved as expeditiously as possible.

                                             Respectfully Submitted,

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